

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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ARTHUR ANGERMEIR et al.,	:	
	:	
Plaintiffs	:	
	:	No. 12-cv-0055 (KBF)
-v-	:	
	:	
JAY COHEN et al.,	:	
Defendants.	:	
-----X		
PATRICIA J. RITCHIE,	:	
	:	
Plaintiff,	:	
	:	No. 12-cv-4992 (KBF)
-v-	:	
	:	
NORTHERN LEASING SYSTEMS, INC. Et al.,	:	
	:	
Defendants.	:	
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Plaintiffs' Notice of Motion For Sanctions

PLEASE TAKE NOTICE THAT upon the annexed Declaration of Krishnan S. Chittur, Esq., dated June 11, 2015; upon the Orders dated April 27, 2015, and May 7, 2015, which Orders are filed as dkt. 129, and dkt. 137 in *Angermeir* ("Orders"); and upon all prior proceedings, Plaintiffs (except Angermeir) in both actions will move this Court before the Honorable Katherine B. Forrest, Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York at such date and time as may be convenient to the Court for an order seeking the following relief as a result of Defendants' failure to comply with multiple orders of this Court concerning discovery:

1. A judgment striking Defendants' Answer and counterclaims, with prejudice, together with costs and disbursements to Plaintiffs; and
2. An inquest to determine Plaintiffs' damages and attorneys' fees and expenses

incurred herein; and

3. For such further and other reliefs as may be appropriate.

Dated: New York, New York
June 11, 2015

CHITTUR & ASSOCIATES, P.C.

Sd/

By: Krishnan Chittur, Esq. (KC 9258)

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